

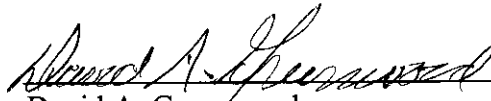
Defendants.)

Plaintiff MK Gold Company ("MK Gold"), defendant Morrison Knudsen Corporation ("Morrison Knudsen"), and non-parties Apex Silver Mines Limited ("Apex"), through their respective counsel, and Francis R. McAllister, and Stanley Dempsey of Denver Mining Finance, stipulate and agree and, on that basis, move for entry of a Protective Order by the Court as follows:

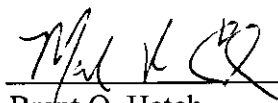
1. MK Gold has served a Subpoena Duces Tecum upon Apex in the above-referenced action. The parties to this Agreement expressly agree that the Confidentiality Agreements, Stipulations and Joint Motions for Protective Order previously entered in this case by MK Gold, Morrison Knudsen and Leucadia National Corporation (the "Agreements"), and the Protective Orders entered by the Court pursuant thereto (the "Orders"), shall govern the disclosure of any documents produced by Apex in response to the Subpoena Duces Tecum served by MK Gold as though the documents were produced in this civil action by any party. The Agreements and the Orders are incorporated by reference herein. Francis R. McAllister and Stanley Dempsey agree to be bound by the orders previously entered in this case.

DATED this 5th day of January, 2001.

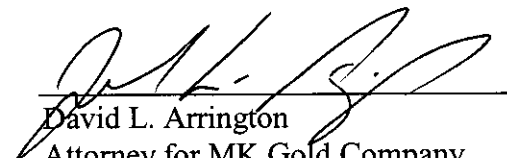
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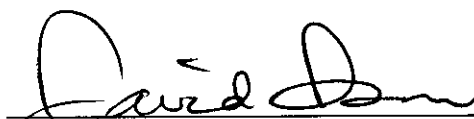
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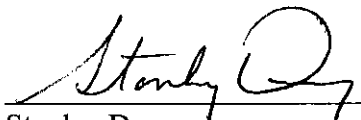
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